



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

Ms. Jayme Graham, Manager  
Allegheny County Health Department  
Air Program  
301 39<sup>th</sup> Street, Building #7  
Pittsburgh, PA 15201-1811

Dear Ms. Graham:

Thank you for the opportunity to comment on Allegheny County Health Department's draft installation permits for the U.S. Steel Mon Valley Works facilities to meet the 2010 1-hour sulfur dioxide (SO<sub>2</sub>) National Ambient Air Quality Standard (NAAQS).

The U. S. Environmental Protection Agency's comments are enclosed.

If you have any questions, please do not hesitate to contact me or have your staff contact Leslie Jones, at 215-814-3409 or [jones.leslie@epa.gov](mailto:jones.leslie@epa.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia Stahl", is positioned above the typed name.

Cynthia Stahl,  
Acting Associate Director



**EPA Region 3 Comments to Allegheny County Health Department's *Proposed Merged Installation Permits to meet the 2010 1-hour SO<sub>2</sub> National Ambient Air Quality Standards (NAAQS)*, dated July 24, 2017. Comments Prepared August 2017**

1. In Allegheny County Health Department's (ACHD) proposed SO<sub>2</sub> Attainment Demonstration dated May 1, 2017 (out for public hearing and comment from May 5, 2017 to June 5, 2017), reductions in emission limits for many SO<sub>2</sub> emissions sources at the U.S. Steel Mon Valley Works, Clairton Works were used to model attainment of the 2010 1-hour Sulfur Dioxide (SO<sub>2</sub>) National Ambient Air Quality Standard (NAAQS). All emission limits needed to attain and maintain the NAAQS must be incorporated by reference into the Pennsylvania's State Implementation Plan (SIP) to be federally enforceable and should be submitted with ACHD's final attainment plan.

As stated in ACHD's notification, these installation permits are federally enforceable and ACHD will seek approval by U.S. EPA for these conditions to be incorporated into the Pennsylvania SIP. In the Clairton Works proposed installation permit (#0052-I017), four (4) emission sources in which ACHD is relying on emission reductions to demonstrate attainment in the May 1, 2017 SO<sub>2</sub> attainment plan are not included. These sources are listed in Table 3-3 of ACHD's SO<sub>2</sub> attainment plan:

- U.S. Steel Clairton Batteries 1-3 Fugitives (Hot Car)
- U.S. Steel Clairton Batteries 13-15 Fugitives (Hot Car)
- U.S. Steel Clairton Batteries 19-20 Fugitives (Hot Car)
- U.S. Steel Clairton C Battery Fugitives (Hot Car)

ACHD should ensure that these four (4) emission sources and their respective emission limits per ACHD's proposed SO<sub>2</sub> Attainment Demonstration dated May 1, 2017 are incorporated into this federally enforceable installation permit.

EPA Comments on ACHD DRAFT Installation Permits for 1-hour SO<sub>2</sub> NAAQS:  
Public comment period: July 24, 2017- August 24, 2017

**I. SUMMARY:**

These permit actions incorporate federally enforceable Sulfur Dioxide emissions limits which will be incorporated into the Allegheny County portion of the Pennsylvania State Implementation Plan. The following comments are provided to ensure the limits provided in permit conditions are practically enforceable.

**II. COMMENTS:**

**A. Braddock Recovery, ACHD Permit #0265-I006:**

1. Permit Condition V.A.2a:
  - a. Please include the stack testing requirements for the rotary dryer if the facility does not determine SO<sub>2</sub> emissions by 'converting the H<sub>2</sub>S concentration (grains/100 dscf) of the fuel burned and the fuel flow rate..."
  - b. It is recommended that phrase "In lieu of stack testing" be clarified to explicitly state that only certain stack test requirements (such as the periodic stack testing requirement) may be fulfilled by the fuel H<sub>2</sub>S concentration procedures. As currently written, this condition may contradict permit condition V.A.2.b which allows the Department to require emissions testing.
2. Permit Condition V.A.2a:
  - a. Please include the required frequency of H<sub>2</sub>S concentration testing.
  - b. Please verify that the condition should read, "The permittee may determine the H<sub>2</sub>S concentration (grains/100 dscf) and the fuel burned." Rather than "The permittee may determine the H<sub>2</sub>S concentration (grains/100 dscf) of the fuel burned." (i.e. 'and' vs. 'of')

**B. U.S. Steel Clariton Works ACHD #0052-I017:**

3. Permit condition V.A.2.a:
  - a. Please clarify where the "combustion stacks" are located, and what emissions units are connected to each combustion stack.
  - b. How is compliance with the battery underfiring limits in table V.A.1 ensured?

**III. ALSO PUBLIC NOTICED DURING THIS PERIOD:**

**A. U.S. Steel- Irvin Plant ACHD #005-I008**

**B. U.S. Steel- Edgar Thompson Works ACHD #0051-I006**

Prepared by  
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